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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Terrorist Attacks on September 11, 2001

03 MDL 1570 (RCC)  
ECF Case

This document relates to:

*Federal Insurance Co., et al. v. Al Qaida, et al.*, Case No. 03-CV-6978 (S.D.N.Y.)  
*Kathleen Ashton, et al v. Al Qaeda Islamic Army, et al.* Case No. 1:02-6977 (S.D.N.Y.)  
*Thomas E. Burnett, Sr., et al. v. Al Baraka Investment & Development Corp., et al.*, Case No. 03-CV-9849 (S.D.N.Y.)  
*Cantor Fitzgerald & Co., et al. v. Akida Bank Private, Ltd., et al.*, Case No. 04-CV-7065 (S.D.N.Y.)  
*Continental Casualty Co., et al. v. Al Qaeda Islamic Army, et al.*, Case No. 04-CV-05970-UA (S.D.N.Y.)  
*Euro Brokers, Inc., et al. v. Al Baraka Investment and Development Corp., et al.*, Case No. 04-CV-07279-UA (S.D.N.Y.)  
*New York Marine and General Insurance Co. v. Al Qaida, et al.*, Case No. 04-CV-6105 (S.D.N.Y.)  
*Estate of John P. O'Neill, Sr., on behalf John P. O'Neill, Sr., deceased, and on behalf of decedent's heirs-at-law, et al. v. Al Baraka Investment and Development Corp., et al.*, Case No. 04-CV-1923 (S.D.N.Y.)  
*World Trade Center Properties, LLC, et al. v. Al Baraka Investment and Development Corporation, et al.*, Case No. 04-CV-7280 (S.D.N.Y.)

**STIPULATION AS TO SERVICE OF PROCESS AND EXTENSION OF TIME  
TO RESPOND TO COMPLAINTS CONSOLIDATED UNDER MDL 1570**

It is HEREBY STIPULATED AND AGREED, by and between Plaintiffs in all of the above-referenced cases consolidated under 03 MDL 1570 and Defendants Al Haramain Islamic Foundation, Inc. (U.S.A.) ("AHIF") and Perouz Sedaghaty, by and through their undersigned counsel, that the undersigned Defendant's counsel hereby accepts service of the Complaint in each of the cases referenced above in which AHIF and/or Mr. Sedaghaty are named as defendants.

IT IS FURTHER HEREBY STIPULATED AND AGREED that Plaintiffs pursuing claims for relief under the Racketeer Influenced and Corrupt Organizations Act ("RICO") shall

serve their respective RICO Statements, in accordance with Case Management Order No. 2, ¶ 14, and in the format required by the U.S. District Court for the Southern District of New York, *i.e.*, as set forth in [http://www.nysd.uscourts.gov/Individual\\_Practices/rico.pdf](http://www.nysd.uscourts.gov/Individual_Practices/rico.pdf), concerning AHIF and/or Mr. Sedaghaty, on or before December 24, 2004.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the time for AHIF and Mr. Sedaghaty to answer or otherwise respond to the Complaint in each of the cases referenced above, shall be on or before February 7, 2005.

IT IS FURTHER HEREBY STIPULATED AND AGREED that the Plaintiffs' response to AHIF and Mr. Sedaghaty's responsive pleadings, if any, shall be served within sixty days of receipt of same from defendant's counsel, and that defendant's counsel shall file reply papers, if any, within thirty days of receipt of plaintiffs' opposing papers.

IT IS FURTHER HEREBY STIPULATED AND AGREED that AHIF and Mr. Sedaghaty hereby waive any and all affirmative defenses, objections, privileges, immunities and arguments relating to service of process in each of the cases referenced above, but preserves any and all other defenses, objections, privileges, immunities and arguments available to it.

IT IS FURTHER HEREBY STIPULATED AND AGREED that Plaintiffs shall not include AHIF and Mr. Sedaghaty in any notice of service by publication in any language and shall provide counsel for AHIF and Mr. Sedaghaty with a copy of any such notice, in all languages in which such notice shall appear, in advance of publication.

Respectfully submitted.

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SO ORDERED:



RICHARD CONWAY CASEY, U.S.D.J.

Dated: 1/27/04